

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

TRISH MANGUAL ROLDAN

DEBTOR

CASE NO 15-02360-BKT

CHAPTER 13

**DEBTOR'S REPLY TO *TRUSTEE'S POSITION REGARDING URGENT MOTION*
REQUESTING AUTHORIZATION FOR LOAN, DOCKET #38**

TO THE HONORABLE COURT:

NOW COMES, TRISH MANGUAL ROLDAN, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 17, 2015, the debtor filed *Debtor's Motion Requesting Court Authorization to Incur in Credit Pursuant to FRBP Rule 4001*, docket #37, requesting authorization to renew her retirement loan with the Puerto Rico Retirement System in order to pay for vehicle repairs.

2. On December 17, 2015, the Chapter 13 Trustee filed *Trustee's Position Regarding Urgent Motion Requesting Authorization for Loan*, docket #38, objecting to debtor's request to renew her retirement loan and basically alleging that by renewing the retirement loan the debtor is affecting the feasibility of the confirmed Plan since she will not be able to increase Plan payments on month 42 of the Plan.

3. The debtor respectfully submits that on this same date December 18, 2015, she filed a post-confirmation modification of Plan, docket #39, to amend the Payment Plan Schedule in order to comply with the distribution of the confirmed Plan (docket #19) and cure the feasibility issue raised by the Trustee in his opposition to debtor's request to renew her retirement loan.

Page -2-
Debtor's Reply to Trustee's Unfavorable Report
Case no. 15-02360-BKT13

4. Furthermore, the debtor respectfully submits that she will adjust her budget in order to comply with the proposed step-up (\$34) included in the post-confirmation modification of Plan, docket #39, commencing on month 13 of the Plan (April/2016).

5. With this information debtor responds to the *Trustee's Position Regarding Urgent Motion Requesting Authorization for Loan*, docket #38.

WHEREFORE debtor respectfully requests this Honorable Court that *Debtor's Motion Requesting Court Authorization to Incur in Credit Pursuant to FRBP Rule 4001*, docket #37, be granted, and that *Trustee's Position Regarding Urgent Motion Requesting Authorization for Loan*, docket #38, objecting debtor's request be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the debtor to her address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of December, 2015.

/s/ **Roberto Figueroa Carrasquillo**
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
PO BOX 186 CAGUAS PR 00726-0816
TEL (787)744-7699 FAX (787)746-5294
EMAIL: rfigueroa@rfclawpr.com